

# **EXHIBIT H**

**REDACTED VERSION OF DOCUMENT  
PROPOSED TO BE FILED UNDER SEAL**

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Attorneys for PROTON MANAGEMENT LTD.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ELECTRIC SOLIDUS, INC. d/b/a  
SWAN BITCOIN, a Delaware  
corporation,

Plaintiff,

v.

PROTON MANAGEMENT LTD., a  
British Virgin Islands corporation;  
THOMAS PATRICK FURLONG;  
ILIOS CORP., a California corporation;  
MICHAEL ALEXANDER HOLMES;  
RAFAEL DIAS MONTELEONE;  
SANTHIRAN NAIDOO; ENRIQUE  
ROMUALDEZ; and LUCAS  
VASONCELOS,

Defendants.

Case No. 2:24-cv-8280-MWC-E

**DEFENDANT PROTON  
MANAGEMENT LTD'S  
RESPONSES AND OBJECTIONS  
TO PLAINTIFF'S THIRD SET OF  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

Am. Complaint filed: January 27, 2025

1 PROPOUNDING PARTY: Plaintiff ELECTRIC SOLIDUS, INC. d/b/a SWAN  
2 BITCOIN

3 RESPONDING PARTY: Defendant PROTON MANAGEMENT LTD

4 SET NO.: Three (3)

5 Pursuant to Federal Rule of Civil Procedure 34, Defendant PROTON  
6 MANAGEMENT LTD (“Responding Party”) submits these responses and  
7 objections to the Third Set of Requests for Production propounded by Plaintiff  
8 ELECTRIC SOLIDUS, INC. d/b/a SWAN BITCOIN (“Propounding Party”).

9 **PRELIMINARY STATEMENT**

10 The following responses are made solely for the purpose of, and in relation to,  
11 this action. Each response is provided subject to all appropriate objections  
12 (including, without limitation, objections concerning competency, relevancy,  
13 materiality, propriety, and admissibility) that would require the exclusion of any  
14 statement contained herein if the statement were made by a witness present and  
15 testifying in court. All such objections and grounds therefore are reserved and may  
16 be interposed at the time of trial.

17 The following responses are based on the facts and information presently  
18 known and available to Responding Party. Discovery, investigation, research, and  
19 analysis are still ongoing in this case and may disclose the existence of additional  
20 facts, add meaning to known facts, establish entirely new factual conclusions or  
21 legal contentions, or possibly lead to additions, variations, or changes to these  
22 responses. Without being obligated to do so, Responding Party reserves the right to  
23 change or supplement these responses as additional facts are discovered, revealed,  
24 recalled, or otherwise ascertained, and as further analysis and research disclose  
25 additional facts, contentions or legal theories which may apply.

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**OBJECTIONS TO DEFINITIONS**

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2 1. Responding Party object to the definition of [REDACTED] as  
3 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
4 that it includes “any of the members, employees, representatives, officers, directors,  
5 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
6 and any other entities or Persons acting or purporting to act on its behalf, including  
7 but not limited to [REDACTED] For purposes of responding to the  
8 Requests, Responding Party will interpret [REDACTED]  
9 [REDACTED]

10 2. Responding Party objects to the definition of [REDACTED] as overly  
11 broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it  
12 includes “any of its members, employees, representatives, officers, directors,  
13 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
14 and any other entities or Persons acting or purporting to act on its behalf.” For  
15 purposes of responding to the Requests, Responding Party will interpret [REDACTED]  
16 [REDACTED]

17 3. Responding Party objects to the definition of [REDACTED] as  
18 overly broad, unduly burdensome, vague, ambiguous and unintelligible to the extent  
19 that it includes “any of its members, employees, representatives, officers, directors,  
20 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
21 and any other entities or Persons acting or purporting to act on its behalf, including  
22 but not limited to [REDACTED] For purposes of responding to the  
23 Requests, Responding Party will interpret [REDACTED]  
24 [REDACTED]

25 4. Responding Party objects to the definition of [REDACTED] as overly  
26 broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it  
27 includes [REDACTED] and any of the members,  
28 employees, representatives, officers, directors, managers, agents, attorneys, assigns,

1 predecessors, affiliates, parents, subsidiaries, and any other entities or Persons acting  
2 or purporting to act on its behalf.” For purposes of responding to the Requests,  
3 Responding Party will interpret [REDACTED]

4 [REDACTED]  
5 5. Responding Party objects to the definition of [REDACTED] as overly  
6 broad, unduly burdensome, vague, ambiguous and unintelligible to the extent that it  
7 includes “any of the members, employees, representatives, officers, directors,  
8 managers, agents, attorneys, assigns, predecessors, affiliates, parents, subsidiaries,  
9 and any other entities or Persons acting or purporting to act on its behalf, including  
10 but not limited to [REDACTED] and any of that entity’s members, employees,  
11 representatives, officers, directors, managers, agents, attorneys, assigns,  
12 predecessors, affiliates, parents, subsidiaries, and any other entities or Persons acting  
13 or purporting to act on its behalf.” For purposes of responding to the Requests,  
14 Responding Party will interpret [REDACTED]

15 **RESPONSES TO REQUESTS FOR PRODUCTION**

16 **REQUEST FOR PRODUCTION NO. 59:**

17 Documents concerning or reflecting Your and/or Your counsel’s  
18 Communications with any of the targets or recipients of a subpoena in this Action  
19 (including [REDACTED])  
20 related to such subpoena. For the avoidance of doubt, this request seeks the  
21 Communications themselves, as well as evidence of such Communications (such as  
22 calendar invites, or agreements regarding the subpoena responses).

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

24 Responding Party objects to this request to the extent that it seeks information  
25 that is protected from disclosure by the attorney-client privilege, work product  
26 doctrine, or any other applicable privilege or protection. Responding Party objects to  
27 the request to the extent that it purports to require Responding Party to produce  
28 documents that contain confidential business, financial, proprietary, or sensitive

1 information of Responding Party or third parties without entry of a satisfactory  
2 confidentiality order. Responding Party further objects to the request as it seeks  
3 information that is not relevant to the claims in this action and not reasonably  
4 calculated to lead to the discovery of admissible evidence.

5  
6 Dated: April 16, 2025

BERGESON, LLP

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9 By: /s/ Adam C. Trigg

Adam C. Trigg

10 Attorneys for PROTON MANAGEMENT  
11 LTD.  
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**CERTIFICATE OF SERVICE**

I, Adam C. Trigg, hereby certify that on April 16, 2025, a copy of the foregoing **DEFENDANT PROTON MANAGEMENT LTD'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was served via email, on counsel of record in this action.

/s/ Adam C. Trigg  
Adam C. Trigg